

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION)
Plaintiff)

V.)

DIRECT MARKETING CONCEPTS, INC.)
et al, Defendants)

DOCKET # 1:04-cv-11136-GAO

DEFENDANTS TRIAD ML MARKETING, INC.,
KING MEDIA, INC. AND ALLEN STERN
MOTION TO FURTHER EXTEND TIME
FOR RESPONDING TO COMPLAINT (ASSENTED TO)

The defendants Triad ML Marketing, Inc., King Media, Inc. and Allen Stern move that the time within which these defendants may answer, move or otherwise respond to the Federal Trade Commission's Complaint be further extended to and including Wednesday, December 1, 2004.

In support of this motion the undersigned counsel respectfully represents as follows:

1. The defendants Triad ML Marketing, Inc. and King Media, Inc. both have offices only in Pennsylvania, and Allen Stern is a resident of Pennsylvania (hereinafter collectively referred to as the "Pennsylvania Defendants.")

2. The Pennsylvania defendants have been represented by a Washington DC law firm.

3. The Washington D.C. law firm has been in communication and negotiations with the Federal Trade Commission on behalf of the Pennsylvania Defendants.

4. I am informed that negotiations between the Washington D.C. law firm and the Federal Trade Commission, are ongoing and progressing, that the additional requested time is reasonably necessary to complete the negotiations, and that there is a reasonable prospect that the negotiations now ongoing may obviate the need for further proceedings with respect to these

three Pennsylvania Defendants..

5. The Federal Trade Commission has assented to this further extension.

WHEREFORE the defendants Triad ML Marketing, Inc., King Media, Inc. and Allen Stern move that the time within which these defendants may answer, move or otherwise respond to the Complaint be extended to and including Wednesday, December 1, 2004.

By their attorneys,

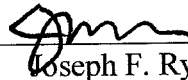


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Certificate of Compliance

I have conferred with Attorney Daniel Kaufman, attorney for plaintiff Federal Trade Commission, and the Federal Trade Commission assents to this motion.

November 1, 2004

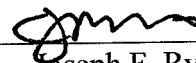


Joseph F. Ryan BBO# 435720

Certificate of Service

I certify that I served the foregoing motion this date by telecopier upon plaintiff Federal Trade Commission and by U.S. Mail upon all other counsel of record who are not listed as receiving ECF service.

November 1, 2004



Joseph F. Ryan BBO# 435720